

EXHIBIT 51

Redacted Excerpts of Deposition of Sean Shelby

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)
FITCH, on behalf of)
themselves and all others)
similarly situated,)
)
Plaintiffs,)
)
vs.) Case No.
) 2:15-cv-01045-RFB-(PAL)
)
ZUFFA, LLC, d/b/a Ultimate)
Fighting Championship and)
UFC,)
)
Defendant.)
)

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF SEAN SHELBY

Las Vegas, Nevada

April 12, 2017

9:11 a.m.

Reported By:
Gale Salerno, RMR, CCR No. 542
Job No. 49972

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	118	
1	(Exhibit 7 was marked for	120
2	identification.)	
3	BY MR. MADDEN:	
4	Q. You've been handed what's been marked as	
5	Exhibit 7. It's another text compilation between --	
6	well, it's a text compilation that includes multiple	
7	parties, but it's not group text, if you understand	
8	what I'm saying.	
9	A. Uh-huh.	
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31 (Pages 118 to 121)

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1 for today, but I will be holding the deposition open 2 because of the state of the text messages as produced 3 and the lack of information for the senders and 4 recipients of not only some of the texts I discussed 5 today, but also additional texts that were not 6 discussed potentially in part because of the lack of 7 that information, and in addition, based on the 8 recent production of the privilege log, which we have 9 not yet had an opportunity to review and/or challenge 10 entries that may be applicable to Mr. Shelby.	1 STATE OF _____) 2 _____) :ss 3 COUNTY OF _____) 4 5 6 7 I, SEAN SHELBY, the witness 8 herein, having read the foregoing 9 testimony of the pages of this deposition, 10 do hereby certify it to be a true and 11 correct transcript, subject to the 12 corrections, if any, shown on the attached 13 page.
11 MR. WIDNELL: Okay. And let the record 12 reflect that at this point you have already used more 13 than seven hours of time. Thank you.	14 15 16 17 18 19 20 21 22 23 24 25
14 THE COURT REPORTER: Before we go off the record, may I ask you, Mr. Widnell, on the record 15 your transcript order?	14 15 16 17 18 19 20 21 22 23 24 25
17 MR. WIDNELL: If we could get a rough as soon as possible, and then a full and miniscript in the regular time period that you use.	17 18 19 20 21 22 23 24 25
20 THE COURT REPORTER: Thank you.	20 21 22 23 24 25
21 THE VIDEOGRAPHER: This concludes today's deposition by Sean Shelby. The number of media used was seven videotapes.	21 22 23 24 25
24 We are now off the record, and the time approximately 6:09 p.m.	24 25
271	273
1 (A discussion was held off the record.) 2 MR. WIDNELL: Let's put on the written record one key point that we're designating the transcript confidential, pending confidentiality designations? 3 And then I'm sorry, what was your other question? 4 THE COURT REPORTER: Read and sign? 5 MR. WIDNELL: Yes, we will read and sign. 6 - - - 7 (The videotaped deposition was adjourned at 6:10 p.m.) 8 - - - 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1 CERTIFICATE OF REPORTER 2 STATE OF NEVADA) 3 SS: 4 COUNTY OF CLARK) 5 I, GALE SALERNO, a certified court reporter, do hereby certify: 6 That prior to being examined, the witness in the foregoing proceedings was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth; 7 That said proceedings were taken before me at the time and place therein set forth and were taken down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision; and that transcript review was requested pursuant to NRCP 30(e). 8 I further certify that I am neither counsel for nor related to any party to said proceedings, and that I am not anywise interested in the outcome thereof. 9 IN WITNESS WHEREOF, I have hereunto subscribed my name this 26th day of April, 2017. 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

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